

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

**IN RE: CHANGE HEALTHCARE,
INC. CUSTOMER DATA SECURITY
BREACH LITIGATION**

This Document Relates to All Actions

Case No. 24-md-3108 (DWF/DJF)

**JOINT STIPULATION SETTING
BRIEFING SCHEDULE
REGARDING NON-PERSONAL
JURISDICTION ARGUMENTS IN
DEFENDANTS' MOTION TO
DISMISS (DKT. 251 AT 17–20)**

Plaintiffs and Defendants (collectively, the “Parties”), by and through their respective counsel, hereby stipulate and agree as follows:

1. WHEREAS, on March 21, 2025, Defendants filed a motion to dismiss for lack of personal jurisdiction as to Change Healthcare Inc. and Change Healthcare Operations, LLC;

2. WHEREAS, on April 14, 2025, the Court subsequently lifted the discovery stay for the limited purpose of allowing Plaintiffs to serve jurisdictional discovery on Change Healthcare Inc. and Change Healthcare Operations, LLC. Dkt. 311;

3. WHEREAS, Defendants now request resolution of the non-personal jurisdiction arguments raised in Section II of their Motion to Dismiss, *see* Dkt. 251 at 17–20 (“Section II”) as soon as practicable;

4. WHEREAS, the Parties have conferred and agreed to a briefing schedule concerning the arguments raised in Section II of Defendants’ Motion to Dismiss;

5. NOW, THEREFORE, the Parties stipulate and agree as follows:

- a. Plaintiffs' response in opposition to the arguments set forth in Section II of Defendants' Motion to Dismiss shall be due on Tuesday, June 3, 2025;
- b. Defendants' reply in support of the arguments set forth in Section II of Defendants' Motion to Dismiss shall be due on Tuesday, June 10, 2025;
- c. Oral argument on the issues set forth in Section II of Defendants' Motion to Dismiss shall be heard on Thursday, June 12, 2025 in conjunction with the other Motions to Dismiss slated for the same day;
- d. The Parties further agree that the word count for the response in opposition and reply briefs for Section II will be included in the remaining limits applicable to the Change Healthcare Inc. and Change Healthcare Operations, LLC's Motion to Dismiss for lack of personal jurisdiction.
See Dkt. 248.

IT IS SO STIPULATED.

Respectfully submitted,

Dated: May 21, 2025

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